

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

DAVID A. STEBBINS

PLAINTIFF

VS.

CASE NO. 4:16CV00545-JM

STATE OF ARKANSAS, ARKANSAS
REHABILITATION SERVICES, AND AMY JONES

DEFENDANTS

PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS

Comes now, *pro se* Plaintiff David Stebbins, who hereby submits the following Request for Admissions.

REQUESTED ADMISSION NO. 1: Plaintiff has disabilities including, but not limited to, Asperger Syndrome and depression.

REQUESTED ADMISSION NO. 2: Plaintiff has engaged in various civil rights and discrimination lawsuits in the past.

REQUESTED ADMISSION NO. 3: The Defendants knew about the lawsuits mentioned in Requested Admission No. 2.

REQUESTED ADMISSION NO. 4: In December of 2015, Plaintiff applied with the Defendants – specifically the Arkansas Rehabilitation Services – for funding for college.

REQUESTED ADMISSION NO. 5: The application mentioned in Requested Admission No. 4 was denied by Amy Jones.

REQUESTED ADMISSION NO. 6: The adverse action spoken of in Requested Admission No. 5 was motivated, at least in part, by the statutorily protected activities mentioned in Requested Admission No. 2.

REQUESTED ADMISSION NO. 7: The adverse action spoken of in Requested Admission No. 5 was motivated, at least in part, by the disabilities mentioned in Requested Admission No. 1.

REQUESTED ADMISSION NO. 8: The medical expert who recommended that the disabilities mentioned in Requested Admission No. 1 would interfere with Plaintiff's vocational efforts never actually examined Plaintiff personally.

REQUESTED ADMISSION NO. 9: The Defendants, when engaging in the adverse action spoken of in Requested Admission No. 5, never considered whether any reasonable accommodations may have overcome this deficiency.

REQUESTED ADMISSION NO. 10: From July 5, 2016 through August 4, 2016,

Plaintiff was enrolled as a student at North Arkansas College.

REQUESTED ADMISSION NO. 11: During the enrollment spoken of in Requested Admission No. 10, Plaintiff thoroughly demonstrated that, despite the medical opinion (that was never even based on any personal observations) spoken of in Requested Admission No. 8, he was indeed very much capable of thriving in college.

REQUESTED ADMISSION NO. 12: Despite the irrefutable evidence spoken of in Requested Admission No. 11 that Plaintiff was, indeed, fully capable of being in college, Amy Jones nevertheless refused to re-evaluate Plaintiff's application.

REQUESTED ADMISSION NO. 13: Plaintiff, at the time of his application, expressed a desire to major in either computer science or information technology.

REQUESTED ADMISSION NO. 14: The average nationwide (not statewide, but nationwide) salary for people with bachelor's degrees in computer science and/or information technology is \$87,985.71 per year.

REQUESTED ADMISSION NO. 15: Amy Jones engaged in the retaliation mentioned in Requested Admissions Nos. 5 & 6 knowing full well that Plaintiff's litigation history was protected by the First Amendment.

REQUESTED ADMISSION NO. 16: The State of Arkansas and all her agents and officers will never stop discriminating and retaliating against Plaintiff for his statutorily protected activities, unless they are forced to, solely because they do not like Plaintiff.

REQUESTED ADMISSION NO. 17: The symptoms which formed the basis of the Defendants' denial of services was caused by the State of Arkansas' own illegal and corrupt actions.

REQUESTED ADMISSION NO. 18: The Defendants believe they are above the law.

Please respond within 30 days, or else these facts are admitted by default.



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STATE OF ARKANSAS, ARKANSAS
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DEFENDANTS

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Comes now, *pro se* Plaintiff David Stebbins, who hereby submits the following Request for Production of Documents:

Request for Production No. 1: Produce an entire verbatim copy of the record of Plaintiff's application with the Arkansas Rehabilitation Service (ARS), including, but not limited to, his application, Amy Jones' denial, and all evidence that was used to support Jones' denial.

Request for Production No. 2: Produce a verbatim copy of all of the ARS's policies.

Request for Production No. 3: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #1 of the Complaint and Jury Demand are untrue.

Request for Production No. 4: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #2 of the Complaint and Jury Demand are untrue.

Request for Production No. 5: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #3 of the Complaint and Jury Demand are untrue.

Request for Production No. 6: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #4 of the Complaint and Jury Demand are untrue.

Request for Production No. 7: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #5 of the Complaint and Jury Demand are untrue.

Request for Production No. 8: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #6 of the Complaint and Jury Demand are untrue.

Request for Production No. 9: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #7 of the Complaint and Jury Demand are untrue.

Request for Production No. 10: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #8 of the Complaint and Jury Demand are untrue.

Request for Production No. 11: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #9 of the Complaint and Jury Demand are untrue.

Request for Production No. 12: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #10 of the Complaint and Jury Demand are untrue.

Request for Production No. 13: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #11 of the Complaint and Jury Demand are untrue.

Request for Production No. 14: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #12 of the Complaint and Jury Demand are untrue.

Request for Production No. 15: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #13 of the Complaint and Jury Demand are untrue.

Request for Production No. 16: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #14 of the Complaint and Jury Demand are untrue.

Request for Production No. 17: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #15 of the Complaint and Jury Demand are untrue.

Request for Production No. 18: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #16 of the Complaint and Jury Demand are untrue.

Request for Production No. 19: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #17 of the Complaint and Jury Demand are untrue.

Request for Production No. 20: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #18 of the Complaint and Jury Demand are untrue.

Request for Production No. 21: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #19 of the Complaint and Jury Demand are untrue.

Request for Production No. 22: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #20 of the Complaint and Jury Demand are untrue.

Request for Production No. 23: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #21 of the Complaint and Jury Demand are untrue.

Request for Production No. 24: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #22 of the Complaint and Jury Demand are untrue.

Request for Production No. 25: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #23 of the Complaint and Jury Demand are untrue.

Request for Production No. 26: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #24 of the Complaint and Jury Demand are untrue.

Request for Production No. 27: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #25 of the Complaint and Jury Demand are untrue.

Request for Production No. 28: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #26 of the Complaint and Jury Demand are untrue.

Request for Production No. 29: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #27 of the Complaint and Jury Demand are untrue.

Request for Production No. 30: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #28 of the Complaint and Jury Demand are untrue.

Request for Production No. 31: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #29 of the Complaint and Jury Demand are untrue.

Request for Production No. 32: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #30 of the Complaint and Jury Demand are untrue.

Request for Production No. 33: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #31 of the Complaint and Jury Demand are untrue.

Request for Production No. 34: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #32 of the Complaint and Jury Demand are untrue.

Request for Production No. 35: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #33 of the Complaint and Jury Demand are untrue.

Request for Production No. 36: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #34 of the Complaint and Jury Demand are untrue.

Request for Production No. 37: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #35 of the Complaint and Jury Demand are untrue.

Request for Production No. 38: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #36 of the Complaint and Jury Demand are untrue.

Request for Production No. 39: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #37 of the Complaint and Jury Demand are untrue.

Request for Production No. 40: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #38 of the Complaint and Jury Demand are untrue.

Request for Production No. 41: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #39 of the Complaint and Jury Demand are untrue.

Request for Production No. 42: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #40 of the Complaint and Jury Demand are untrue.

Request for Production No. 43: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #41 of the Complaint and Jury Demand are untrue.

Request for Production No. 44: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #42 of the Complaint and Jury Demand are untrue.

Request for Production No. 45: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #43 of the Complaint and Jury Demand are untrue.

Request for Production No. 46: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #44 of the Complaint and Jury Demand are untrue.

Request for Production No. 47: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #45 of the Complaint and Jury Demand are untrue.

Request for Production No. 48: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #46 of the Complaint and Jury Demand are untrue.

Request for Production No. 49: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #47 of the Complaint and Jury Demand are untrue.

Request for Production No. 50: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #48 of the Complaint and Jury Demand are untrue.

Request for Production No. 51: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #49 of the Complaint and Jury Demand are untrue.

Request for Production No. 52: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #50 of the Complaint and Jury Demand are untrue.

Request for Production No. 53: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #51 of the Complaint and Jury Demand are untrue.

Request for Production No. 54: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #52 of the Complaint and Jury Demand are untrue.

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Request for Production No. 56: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #54 of the Complaint and Jury Demand are untrue.

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Request for Production No. 58: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #56 of the Complaint and Jury Demand are untrue.

Request for Production No. 59: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #57 of the Complaint and Jury Demand are untrue.

Request for Production No. 60: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #58 of the Complaint and Jury Demand are untrue.

Request for Production No. 61: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #59 of the Complaint and Jury Demand are untrue.

Request for Production No. 62: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #60 of the Complaint and Jury Demand are untrue.

Request for Production No. 63: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #61 of the Complaint and Jury Demand are untrue.

Request for Production No. 64: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #62 of the Complaint and Jury Demand are untrue.

Request for Production No. 65: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #63 of the Complaint and Jury Demand are untrue.

Request for Production No. 66: Produce all evidence in your possession to show that the factual allegations contained in Paragraph #64 of the Complaint and Jury Demand are untrue.

Request for Production No. 67: Produce all evidence in your possession to show that Plaintiff's Requested Admission #1 is untrue.

Request for Production No. 68: Produce all evidence in your possession to show that Plaintiff's Requested Admission #2 is untrue.

Request for Production No. 69: Produce all evidence in your possession to show that Plaintiff's Requested Admission #3 is untrue.

Request for Production No. 70: Produce all evidence in your possession to show that Plaintiff's Requested Admission #4 is untrue.

Request for Production No. 71: Produce all evidence in your possession to show that Plaintiff's Requested Admission #5 is untrue.

Request for Production No. 72: Produce all evidence in your possession to show that Plaintiff's Requested Admission #6 is untrue.

Request for Production No. 73: Produce all evidence in your possession to show that Plaintiff's Requested Admission #7 is untrue.

Request for Production No. 74: Produce all evidence in your possession to show that Plaintiff's Requested Admission #8 is untrue.

Request for Production No. 75: Produce all evidence in your possession to show that Plaintiff's Requested Admission #9 is untrue.

Request for Production No. 76: Produce all evidence in your possession to show that Plaintiff's Requested Admission #10 is untrue.

Request for Production No. 77: Produce all evidence in your possession to show that Plaintiff's Requested Admission #11 is untrue.

Request for Production No. 78: Produce all evidence in your possession to show that Plaintiff's Requested Admission #12 is untrue.

Request for Production No. 79: Produce all evidence in your possession to show that Plaintiff's Requested Admission #13 is untrue.

Request for Production No. 80: Produce all evidence in your possession to show that Plaintiff's Requested Admission #14 is untrue.

Request for Production No. 81: Produce all evidence in your possession to show that Plaintiff's Requested Admission #15 is untrue.

Request for Production No. 82: Produce all evidence in your possession to show that Plaintiff's Requested Admission #16 is untrue.

Request for Production No. 83: Produce all evidence in your possession to show that Plaintiff's Requested Admission #17 is untrue.

Request for Production No. 84: Produce all evidence in your possession to show that Plaintiff's Requested Admission #18 is untrue.

Please submit your responses to these requests within thirty (30) days, otherwise you may face sanctions under Fed.R.Civ.P. 37.

So notified on this, the 6th day of January, 2017.



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JAN 10 2017
ATTORNEY GENERAL
ARKANSAS